



June 23, 2003

Mr. Joseph Hogue
Public Information and Records Integrity Branch
Office of Pesticide Programs
Environmental Protection Agency (7502C)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

Dear Mr. Hogue:

Re: Pesticides; Emergency Exemption Process Revision Pilot and Request for
Comment, OPP-2002-0231

The U.S. Apple Association (USApple) is the national trade association representing all segments of the apple industry. Members include 40 state and regional apple associations representing the nation's 7,500 apple growers, as well as 400 individual firms involved in the apple business. USApple appreciates this opportunity to comment on the U.S. Environmental Protection Agency's (EPA) proposals to streamline and improve the pesticide emergency exemption process, more commonly known as "section 18s."

USApple supports EPA's proposal to improve and streamline the section 18 process by suspending documentation requirements in the second and third years for certain section 18 requests. This improvement will relieve industry experts from burdensome data requirements, which often duplicate the original emergency request. This streamlining effort will also save the agency time and effort, which would otherwise be used to unnecessarily review second or third-year section 18 requests.

Additionally, USApple supports the agency's proposal to make the economic justification requirements less burdensome. This practical approach eliminates the need to provide data, which are time consuming and difficult to compile, when a simple crop yield loss statistic will reliably predict significant economic loss.

Finally, USApple supports EPA's willingness to grant section 18s for crop protection tools, which may be used in pest resistance management programs. This feature may be particularly beneficial in helping to extend the usefulness of registered crop protection tools on minor use and specialty crops, which often do not benefit from newly registered products.

703 442-8850
800 781-4443
fax 703 790-0845

Web site www.usapple.org

8233 Old Courthouse Road, Suite 200 ★ Vienna, VA 22182-3816 USA

USApple appreciates this opportunity to comment on this important issue.

Sincerely yours,

A handwritten signature in black ink, reading "JRCranney Jr". The signature is written in a cursive, flowing style.

James R. Cranney, Jr.

Vice President

cc: USApple Board of Trustees
USApple Science Advisory Subcommittee